T-Mobile

November 3, 2003

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: T-Mobile USA, Inc. E-911 Quarterly Report

Dear Ms. Dortch:

In accordance with the terms of the consent decree between T-Mobile USA, Inc. ("T-Mobile") and the Federal Communications Commission ("FCC" or "Commission") related to T-Mobile's deployment of E-911 Phase II services, T-Mobile hereby submits its November 3, 2003 E-911 Quarterly Report ("Report").[1]

T-Mobile continued to make significant strides this past quarter in its E-911 deployment efforts. To date, T-Mobile has deployed 876 of the 1181 (or over 74% of the) requests it has received for Phase I service in its network.[2] The total number of PSAPs presently receiving Phase I information from T-Mobile is 1350. With respect to Phase II, T-Mobile is making noteworthy progress in the design, development and deployment of its network-based Uplink-Time Difference of Arrival ("TDOA") solution for delivering Phase II location information to PSAPs.[3] In fact, T-Mobile has already

[1] *In the Matter of T-Mobile, USA, Inc.*, Order, File No. EB-02-TS-012, FCC 03-172 (rel. July 17, 2003) ("T-Mobile Consent Decree").

[2] The total number of Phase I requests includes those from areas where T-Mobile has no coverage or which are otherwise invalid under the Commission's rules. Subtracting such requests from the total number of Phase I requests received by T-Mobile yields a Phase I deployment rate of approximately 81%.

[3] TDOA calculates a mobile phone's location by comparing the difference in the times at which a signal transmitted from the phone reaches three or more Location Measurement Units ("LMUs") installed in a wireless carrier's base stations.

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begun TDOA deployments in 13 of its markets. T-Mobile continues to work with its TDOA vendor, TruePosition, and through its First Office Application in Seattle, WA, to resolve any interoperability issues that arise and to finalize the provisioning of TDOA equipment and software for T-Mobile's network. While this work proceeds, T-Mobile is continuing to deliver its interim Phase II Network Safety Solution ("NSS")[4] to PSAPs, even as it transitions those communities to TDOA. Specifically, T-Mobile has deployed NSS to 317 PSAPs, which represents deployment of 187 of the 536 (or about 35% of the) requests for Phase II service that it has received to date.[5]

T- Mobile is on track at this time to fulfill the requirements contained in its consent decree to deploy Phase II services across its markets.[6] T-Mobile anticipates that it will meet or beat its next consent decree benchmarks of deployment of TDOA equipment to 1,000 cell sites by April 17, 2004, and to 2,000 cell sites by May 17, 2004. In fact, to date T-Mobile has already deployed 285 LMUs in its network towards these benchmarks.

I. Phase I and Phase II Requests

Paragraph 10(a) of T-Mobile's consent decree requires that T-Mobile provide certain information on all pending Phase I and Phase II requests it has received. **Attachment A** to this Report provides the required information. This attachment follows the standardized reporting spreadsheet the Commission stated this June that Tier I carriers, including T-Mobile, should include with their Quarterly Reports beginning August 1, 2003.[7]

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[4] NSS provides location information accurate to 1000 meters or less to PSAPs. T-Mobile deployed NSS throughout its network in 2002, regardless of whether it had received a request from a PSAP for Phase II service.

[5] The total number of Phase II requests includes those from areas where T-Mobile has no coverage or which are otherwise invalid under the Commission's rules. Subtracting such requests from the total number of Phase II requests received by T-Mobile yields an NSS deployment rate of approximately 36%.

[6] T-Mobile's plan is designed to achieve the swiftest possible deployment of Phase II equipment and services across all of T-Mobile's markets nationally. However, as the consent decree recognizes, T-Mobile is relying on the representations of its vendors in its plans to meet the deployment schedule contained therein. *See* T-Mobile Consent Decree at ¶ 8(c). Further, other issues such as PSAP readiness or LEC issues may impact a carrier's ability to deliver Phase II information to PSAPs under the consent decree.

[7] Public Notice, *Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, CC Docket No. 94-102 (rel. June 6, 2003). T-Mobile has only included the fields for PSAPs from which it has received Phase I and Phase II requests. (T-Mobile automatically considers a request for Phase II information as a request for Phase I information.) However, T-Mobile's records do not perfectly match the PSAP Registry supplied by the FCC in its Public Notice. T-Mobile has added a field to its spreadsheet known as the "PSAP Entity ID" – a PSAP-specific code used by the industry and public safety to identify individual PSAPs and which T-Mobile has loaded into its GMLC. (The first two digits of the PSAP Entity ID identify the state, the next three digits the county, and the last three digits the PSAP entity within the county.) T-Mobile has cross-correlated FCC PSAP ID numbers with PSAP Entity IDs wherever possible.

Attachment A lists all PSAPs covered by requests for Phase I and/or Phase II service received by T-Mobile as of October 15, 2003.[8] T-Mobile has indicated which requests have been deployed and the dates of deployments (note that in a number of cases T-Mobile has deployed E911 service to a PSAP without receiving a request from the PSAP but, in anticipation of receiving such a request, worked with the PSAP and its service provider to complete the deployment). Where a PSAP's request has not been fulfilled, T-Mobile has supplied the projected deployment date,[9] and the reason(s) for delay if a PSAP's Phase I request has not been satisfied within 6 months from the date of receipt of the request. T-Mobile's projected deployment dates reflect its current estimate of when it should satisfy a PSAP's request for Phase I or Phase II services; these dates, however, depend on external factors such as vendor performance, and PSAP and LEC readiness, and could potentially change.

Regarding the field labeled "Invalid Request" on the spreadsheet, T-Mobile has placed a "Yes" in the field to designate a PSAP's request as invalid in cases where T-Mobile: (a) currently does not have coverage in the area for which the PSAP is responsible and therefore the request is invalid under the Commission's Rules; [10] (b) has filed a certification with the FCC pursuant to the Richardson Recon Order; [11] or (c) has not received all the documentation required under the Richardson Order[12] to determine PSAP readiness. (T-Mobile has also noted where the requests are classifiable as "tolled" if received after the effective date of the Richardson Recon Order.) **With the exception of instances in which it does not have coverage, however, T-Mobile's operating policy is not to delay implementation based on questions about the validity of a particular request, but to proceed to deploy the request as much as possible.** T-

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[8] Note that in accordance with Paragraph 10(a) of the T-Mobile Consent Decree, for all pending Phase I and Phase II requests, T-Mobile has reported in **Attachment A** the date on which it received the particular request from the PSAP. For requests that have already been deployed, the date listed is the date given on the PSAP's request for E911 service. T-Mobile reported the date of request (as opposed to the date of receipt) in its August 2003 Quarterly Report, based on the instructions given in the Commission's Public Notice on the standardized reporting format, and regrets any confusion this may cause.

[9] In the case of PSAP requests in the states of California and Nevada, T-Mobile is relying on the projected deployment dates given to it pursuant to the joint venture company established by T-Mobile and Cingular Wireless for the provision of services in those states. *See* "Cingular, VoiceStream to Share Wireless Networks in New York, California and Nevada," available at http://www.t-mobile.com/company/pressroom/pressrelease19.asp.

[10] *See* 47 C.F.R. § 20.18(a).

[11] *Petition of City of Richardson*, Order on Reconsideration, CC Docket No. 94-102, 7 FCC Rcd 24282 (2002) ("Richardson Recon Order"), *recons. pending*.

[12] *Petition of City of Richardson*, Order, CC Docket No. 94-102, 16 FCC Rcd 18982 (2001) ("Richardson Order").

Mobile does reserve the right in the future to assert the invalidity of a request, or to file a certification with the FCC regarding a particular request, should circumstances arise that warrant such action, notwithstanding the fact that it does not categorize a particular request as invalid in this Report.

II. T-Mobile Location Technology

Paragraph 10(b)(1) of T-Mobile's consent decree requires that each Quarterly Report contain a statement of whether T-Mobile's network based technology for delivering Phase II information meets the Commission's network based accuracy requirements.[13]

Under the agreement between T-Mobile and TruePosition, TruePosition is obligated to deliver location technology that complies with the FCC's requirements for network-based location technologies – accuracy to within 100 meters for 67% of calls and 300 meters for 95% of calls. As described in T-Mobile's August 2003 Quarterly Report to the Commission, the results of TruePosition's recent trial with Cingular Wireless in and around Wilmington, Delaware yielded the following results: 67% of the location estimates had an error less than 47.1 meters, and 95% of the location estimates had an error less than 112.2 meters. These results are well within the FCC's requirements for network based solutions.

T-Mobile and TruePosition will be conducting accuracy testing on T-Mobile's Bellevue, WA FOA system during the month of November. T-Mobile will provide the results of that trial in its next E911 Quarterly Report.

III. NSS/E-OTD

Pursuant to paragraph 10(b)(10) of T-Mobile's consent decree, T-Mobile confirms that it continues to provide NSS location information to PSAPs for all deployments that were receiving and utilizing such location information as of the Effective Date of the decree. Further, T-Mobile has worked with each of the three PSAPs receiving E-OTD location information as of the Effective Date of the consent decree on a plan for the termination of the provision of E-OTD information and the transition to the provision of TDOA location information. Specifically, E-OTD has been de-commissioned in St. Clair, Illinois and, discussions are underway for the de-commissioning of E-OTD in Denton, Texas and the State of Rhode Island. NSS information will continue to be delivered to these three PSAPs during their respective

[13] Paragraph 10(b) of the T-Mobile Consent Decree also requires that T-Mobile's Quarterly Reports contain statements regarding whether T-Mobile has met each deployment benchmark falling due in the period immediately preceding the Quarterly Report. T-Mobile does not include these statements (which correspond to Paragraphs 10(b)(2)-(9) of the consent decree) in this Report, as none of these requirements have fallen due in the last quarter. In addition to responding to Paragraph 10(b)(1), T-Mobile provides a response to Paragraph 10(b)(10) below.

transition to TDOA. T-Mobile plans to deploy TDOA to each of these communities in the very early stages of its TDOA deployment. Specifically, T-Mobile projects to complete TDOA deployments in St. Clair, Illinois by May 31, 2004, in Denton, Texas by June 30, 2004, and in the State of Rhode Island by July 30, 2004.

Finally, included with this letter is a declaration from an officer of T-Mobile attesting to the truth and accuracy of this Report, pursuant to Paragraph 10 (c) of T-Mobile's consent decree. T-Mobile is serving this Report on the Executive Directors and counsel for the Association of Public-Safety Communications Officials-International, Inc., the National Emergency Number Association, and the National Association of State Nine One One Administrators, as provided for in the decree. Please contact the undersigned should there be further questions.

Respectfully submitted,

Robert A. Calaff
Senior Corporate Counsel
Governmental & Industry Affairs

Attachment

cc: David H. Solomon, Chief, Enforcement Bureau
John B. Muleta, Chief, Wireless Telecommunications Bureau
Tim Ryan, Interim Executive Director, APCO
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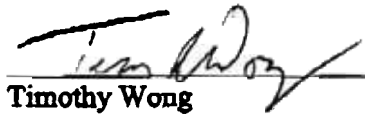
DECLARATION OF TIMOTHY WONG

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Executed on November 3, 2003



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